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Contempt—Misconduct Towards Judge.—Abusing and assaulting a judge after he has retired from the court room, upon adjournment subject to notice, because of his disposition of a case immediately prior thereto, is held, in *Ex parte McCown* (N. C.) 2 L. R. A. (N. S.) 603, to constitute contempt at common law.

Corporations—Stock—Purchase of.—The purchase, by a corporation, of shares of its own capital stock is held, in *Hall v. Alabama Terminal & I. Co.* (Ala.) 2 L. R. A. (N. S.) 130, to be a fraud upon its creditors.

Corporations—Dissolution.—The right of majority stockholders, who have voted to dissolve the corporation, to proceed for a judicial declaration of forfeiture of charter, is upheld in *Chilhowee Woolen Mills v. State ex rel. Majority Stockholders Chilhowee Woolen Mills Co.* (Tenn.) 2 L. R. A. (N. S.) 493, under a statute providing that an action lies for dissolution of a corporation if it does acts which amount to a forfeiture of its rights.

Corporations—Preferred Stock.—The right to make preferred stock non-voting is upheld, under the Missouri statute, in *State, ex rel. Frank v. Swanger* (Mo.) 2 L. R. A. (N. S.) 121.

Foreign Corporations—Service of Process.—A statutory agent of a foreign corporation to receive service of summons is held, in *Bennett v. Supreme Tent. K. of M.* (Wash.) 2 L. R. A. (N. S.) 389, to have no power to admit or waive service where it has not been properly made.

Unauthorized Use of Literary Production.—An unusual case involving questions of literary property arises in Nebraska in a suit by the state against the State Publishing Company, 106 Northwestern Reporter, 434. The state entered into a contract with the publishing company for the publication of a number of volumes of Nebraska Official Reports, the contract requiring the printing of a certain number of copies of each report and the delivery of the stereotype plates to the state after these copies were printed. The publishing company, however, secretly printed a large number of extra copies which it sold on its own account realizing a large profit therefrom, and the state sued to enjoin defendant from selling any such copies and to require it to deliver to the proper officer of the state all copies so unlawfully printed and for an accounting of the profits. Relief was denied on the ground that the unauthorized use of the literary property of another furnished no ground for recovering damages except through the federal copyright laws, and that the mere fact that the state reposed confidence in defendant was not sufficient to create a trust.